

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re Scott & Alicia Davenport, Debtors	Chapter 7
Alicia Davenport, Movant	Case No. 5:11-bk-07755-JJT
v.	Matter: Motion to Avoid Lien
American Express Centurion Bank Respondent	

Information Required by 11 U.S.C. § 342(c)

Scott Michael Davenport 423 Morgan St. Dickson City, PA 18519Tax Identification Number: xxx-xx-2440	Alicia Davenport 423 Morgan St. Dickson City, PA 18519 Tax Identification Number: xxx-xx-4237
--	--

DEBTOR'S MOTION TO AVOID LIEN

I: Motion to Avoid Lien of American Express Centurion Bank

1. This motion is filed pursuant to 11 U.S.C. § 522(f) to avoid and cancel a judicial lien on real property used as the Debtor's residence.
2. On or about **October 24, 2011, American Express Centurion Bank ("AMEX")** obtained a judicial lien on the real property used as Debtor's residence at **423 Morgan St., Dickson City, PA, 18519**. The lien was entered in **Lackawanna** County at docket number **11-cv-04677** in the amount of \$28,969.95.
3. Debtor's interest in the property referred to in the preceding paragraph and encumbered by the lien does not exceed \$20,000 in value and has been claimed as fully exempt in the bankruptcy case.

4. The existence of **AMEX**'s lien on Debtor's real property impairs exemptions to which the Debtor would be entitled under 11 U.S.C. § 522(b).

5. **AMEX**'s lien does not secure a debt for a domestic support obligation.

WHEREFORE, Debtor requests an Order canceling the lien.

Date: January 5, 2012

s/ Brett Freeman

Brett Freeman, Attorney for Debtor
Sabatini Law Firm, LLC
216 N. Blakely St.
Dunmore, PA 18512
Phone (570) 341-9000
Facsimile (570) 504-2769
Email bfecf@bankruptcypa.com
Bar Number PA 308834